

EXHIBIT C

ExxonMobil Production Company
W4.2A.521
P.O. Box 4358
Houston, Texas 77210-4358



January 21, 2016

Harmony Block SM 6635 OCS-P 0190
Heritage Block SM 6683 OCS-P 0182
Hondo Block SM 6636 OCS-P 0188

UPS#: 1ZV6F1400195057219

Re: SYU Preservation Plan

Mr. Nabil Masri
Regional Supervisor, Office of Field Operations
Bureau of Safety and Environmental Enforcement
Pacific OCS Region
760 Paseo Camarillo, Suite 102
Camarillo, California 93010-6064

Dear Mr. Masri:

The Santa Ynez Unit (SYU) Platforms Hondo, Harmony and Heritage and their associated pipelines have been shut in since June 2015 due to the Plains All American Pipeline, L.P. (PAAPL) onshore pipeline break in May 2015. As such, the production from these three platforms has ceased until the PAAPL 901 and 903 pipelines can be returned to operational status and/or another alternative crude oil transportation approach can be approved and implemented.

As presented in our November 3, 2015 meeting held with you and your staff, we described plans for achieving the long-term preservation status of our SYU facilities. This meeting provided a preliminary overview of objectives that explained our philosophy for ensuring the integrity management of facilities in a safe and environmentally responsible manner for the duration of the outage.

Our approach, then and now, includes the preservation of offshore and onshore facilities. For this objective, we have completed the draining, flushing and purging of idle equipment as well as preserving all pipelines with the exception being the produced water pipeline located at Platform Harmony. As originally proposed, we are actively pursuing to de-staff our Harmony and Heritage Platforms and have since requested this variance through your Camarillo District Office. It should be noted that the request to de-staff Platform Harmony and Heritage includes information for surveillance and our mitigating actions pertaining to possible pollution and security events. Surveillance, inspection and maintenance strategies have been reevaluated to conform to a fit-for-propose program which ensures repairs of systems and equipment will continue. For your reference, we have included an updated table which communicates our current plans for the final preserved state of each offshore platform (see table below).

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| Preserved Platform State | | | |
|-----------------------------------|---|--|--|
| | Hondo | Harmony and Heritage | Associated Departures Requested to the BSEE Camarillo District |
| Staffing | Staffed facility | Not staffed; Periodic visitations for inspection and maintenance | |
| Inspection Intervals | Daily | Weekly visit to each platform | Inspection of Facilities- 30 CFR 250.301 |
| Well Isolation | All wells have at least 3 barriers in-place from the hydrocarbon zones to surface (exception being HE13 which is an active water injection well) | | Tubing Plug Inspection- 30 CFR 250.804(a)(1)(iii) Flow Safety Valve Testing- 30 CFR 250.804(a)(6) |
| Utilities Available for Operation | Utility systems available except for those outlined below | Cranes Open and closed drain systems Instrument and utility air Utility and potable water Essential generator Accommodations support Diesel system Subsea cables and power distribution | |
| Safety Systems In-Service | Fire detection ASH "Combustible Gas" detection- applicable to platform's living quarters and wellbay H2S "Toxic Gas" detection- applicable to platform's living quarters and wellbay Firefighting system ESD system Survival: escape equipment | Fire detection H2S "Toxic Gas" Detection- applicable to platform's wellbays Firefighting system (modified jockey pump supply) ESD system Survival: escape equipment | Combustible Gas Detection- 30 CFR 250.804(a)(9) H2S Detector Testing- 30 CFR 250.490(j)(7)(ii) |
| Equipment OOS and Preserved | Process: piping, vessels, HEX, columns, machinery, flares Utility: hot oil, cooling water | Process: piping, vessels, HEX, columns, machinery, flares Utility: hot oil, cooling water | Pressure Safety Valve Testing- 30 CFR 250.804(a)(2) |
| Chemical | Biocide: <500 Gal | Biocide: <500 Gal | |
| Hydrocarbon Inventory | Hot oil: 71 bbl, Diesel: Max 540 bbl, Lube Oil: volume in compressors and pumps | Hot oil: <130 bbl, Diesel: 200 bbl (50% of tank), Lube Oil: volume in compressors and pumps | |
| Overboard Discharge | Automatically as needed through filters and settling tank | Automatic discharge through skim pile | |
| Security | | Security fences installed at +15 at both facilities Remote monitoring capabilities from LFC | |

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Pipeline preservation of the gas pipeline networks for Platforms Harmony, Heritage and Hondo, as well as the onshore facility POPCO, has been completed. This activity involved the depressurization and flushing of the lines with dry nitrogen. Currently, the associated gas pipelines have been filled with approximately 50 pounds of nitrogen. It has been identified that this nitrogen network will be needed to supply nitrogen from onshore systems to offshore platforms during this idle period for the continued preservation of our facilities. As such, a request will be made to the BSEE Camarillo District Office, which will include devices and valves that must be overridden to maintain this preservation process and approach.

The preservation of the emulsion pipeline network (which affects segments from Heritage to Harmony, Hondo to Harmony and finally from Harmony to Las Flores Canyon), has been completed. This activity was accomplished by pigging and flushing the associated pipelines with inhibited seawater.

The produced water pipeline, which begins at Las Flores Canyon and terminates at Platform Harmony, will remain idle and will only be used as needed to dispose of rainwater that accumulates at Las Flores Canyon.

In regards to the request in your letter dated November 17, 2015 "SYU Preservation Plan", concerning Pipeline Information, we have included a separate document, as an enclosure to this letter, encompassing the current state and condition of all pipelines.

In the BSEE letter dated November 17, 2015 "SYU Preservation Plan", ExxonMobil was formally requested to seek specific departures that were identified in our presentation with your office on November 3, 2015, through the BSEE Camarillo District Office. On December 22, 2015, our request for those District related items was received by your office, and that document should be used in conjunction with this letter in your review of our SYU Preservation Plan. To facilitate your review, we are providing a copy of those requests and related attachments as an enclosure which is to be used and considered a part of the overall SYU Preservation Plan.

During our meeting held on November 3, 2015, ExxonMobil originally indicated the possible alteration of our current Oil Spill Response Plan as well as our Oil Spill Response Exercises. After further evaluation of these requirements, at this time we have decided to continue and maintain the plan and response exercises that were previously in place prior to the PAAPL incident. However, as required every 2 years, we will be approaching your office to propose a revision to our current Oil Spill Response Plan which will be based on the status of our oil and gas facilities in their preserved state.

If you should have any questions or need additional information regarding this request, please contact Erik Case at 832-625-4583 or by email at erik.case@exxonmobil.com.

Sincerely,



Kevin M. Dillow
USP-SSHE Manager
Attorney-In-Fact
ExxonMobil Production Company
(a division of Exxon Mobil Corporation)

/EAC

Attachments:

ExxonMobil letter dated December 18, 2015, "Departure Requests"
SYU Pipeline Preservation Plan

cc-
Michael Mitchell- BSEE
Theresa Bell- BSEE
Kartik Garg- ExxonMobil
Mark Decatur- ExxonMobil



United States Department of the Interior
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
PACIFIC OCS REGION
760 Paseo Camarillo, Suite 102
Camarillo, CA 93010-6064

FEB 12 2016

Mr. Erik Case
U.S. Production, Offshore Regulatory Compliance
ExxonMobil Production Company
P.O. Box 4358
Houston, TX 77210-4358

Re: SYU Preservation Plan

Dear Mr. Case:

Thank you for your letter of January 21, 2016, subject as above. As reiterated in that letter, ExxonMobil Production Company's (ExxonMobil) Santa Ynez Unit (SYU) Platforms Hondo, Harmony, and Heritage and their associated pipelines have been shut in since June 2015 due to the Plains All American Pipeline, L.P. (PAAPL) onshore pipeline break in May 2015. Production from these three platforms has ceased until the PAAPL 901 and 903 pipelines return to operational status "and/or another, alternative crude oil transportation approach can be approved and implemented."

The SYU Preservation Plan was developed to ensure that the offshore facilities, including the wells, are properly monitored, inspected, and maintained so that they will be operationally and environmentally safe during the shut-in period and will be in fit condition when production can resume. The Bureau of Safety and Environmental Enforcement (BSEE) will conduct onsite inspections during the shut-in period and prior to approving the restart of operations.

Your January 21, 2016, letter provides additional information in response to the November 17, 2015, letter from the BSEE, and references departure requests covered in ExxonMobil's December 18, 2015, letter (received on December 22, 2015, as noted in your January 21, 2016, letter). In addition, ExxonMobil sent the BSEE two January 21, 2016, letters, Re: Request to Bypass Emulsion Pipeline Safety Devices, and Re: Request to Bypass Gas Pipeline Safety Devices. The BSEE actions on these regulatory departure requests are the subject of a separate letter, dated February 12, 2016, from the BSEE Pacific OCS Region's California District office.

Oil Spill Response Plan and Exercises

In the January 21, 2016, letter, ExxonMobil states that "*at this time we have decided to continue and maintain the plan and response exercises that were previously in place prior to the PAAPL incident.*" ExxonMobil further states that "*as required every 2 years, we will be approaching*

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your office to propose a revision to our current Oil Spill Response Plan which will be based on the status of our oil and gas facilities in their preserved state."

As ExxonMobil has chosen not to revise or change the Oil Spill Response Plan or capabilities for the SYU or the Worst Case Discharge, please be aware that the plan will still be subject to the plan requirements at 30 CFR 254.30. Also, response personnel will continue to be subject to the training requirements found at 30 CFR 254.41 and exercise requirements found at 30 CFR 254.42. Response equipment will continue to be subject to exercise requirements found at 30 CFR 254.42 and maintenance requirements found at 30 CFR 254.43. Please contact the BSEE Oil Spill Preparedness Division's Pacific Oil Spill Preparedness Section if you have any questions.

(Also, we noticed in the H₂S contingency plan, on Page 4-6, Figure 4-2, Emergency Equipment List, that the Clean Seas Oil Spill Response Vessels Mr Clean and Mr Clean III are listed, with phone numbers. Both vessels are out-of-service and have been replaced. ExxonMobil should contact Clean Seas and revise as appropriate.)

SYU Preservation Plan and Conditions of Approval

ExxonMobil's SYU Preservation Plan is comprised of the following documents:

1. January 21, 2016, letter, Re: SYU Preservation Plan, and attachments (#'s 2 and 5 below)
2. December 18, 2015, letter, Re: Departure Requests, and attachments
3. January 19, 2016, letter, Re: Request to Bypass Emulsion Pipeline Safety Devices
4. January 19, 2016, letter, Re: Request to Bypass Gas Pipeline Safety Devices
5. SYU Pipeline Preservation Plan

The BSEE hereby approves the SYU Preservation Plan, with the following conditions:

1. SEMS: ExxonMobil is required to continue implementing and maintaining a safety and environmental management system (SEMS) program that addresses all requirements in 30 CFR 250 Subpart S. The SYU SEMS program must identify, address and manage all safety, environmental hazards, and impacts while the platforms and pipelines are shut-in. In addition, all personnel involved with your SEMS program must be trained to have the skills and knowledge to perform their assigned duty.

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2. Idled Equipment: ExxonMobil must submit a quarterly report detailing your assessment of the idled equipment and its future capabilities.
3. Pipelines: ExxonMobil must submit a Pipeline Preservation Status report for all the SYU pipelines every quarter. The report must include, at a minimum, corrosion coupon results, corrosion inhibitor and biocide residual test results, chemical treatment used, all pigging operations conducted, and the current status of the pipelines.
4. Pipelines/Structures: This is a reminder that ExxonMobil must continue to meet all its obligations, including, but not limited to, performing the required pipeline external inspections and the API RP 2A platform jacket inspections. The next external pipeline inspections are due to be conducted in 2016 and the 2016 API RP 2A jacket inspections must be submitted to this office by November 1, 2016.
5. Platform Security: In our November 17, 2015, letter, we asked that you “*provide verification that the U.S. Coast Guard will respond to security threats in a timely manner.*” In your December 18, 2015, letter, you stated, “*Based upon our review of the Homeland Security Act and other applicable U.S. Coast Guard legal authority, it is our understanding and expectation that the U.S. Coast Guard will timely respond to security threats consistent with its security mission.*” Please provide documentation of your communications with the United States Coast Guard (USCG) on this matter, and preferably a formal agreement, if feasible, between the USCG and ExxonMobil outlining each party’s responsibilities during the shutdown and planned unmanning.
6. Revisions: Any proposed revisions to the SYU Preservation Plan must be submitted to the BSEE for review and approval prior to their implementation.

BSEE Inspections and Monitoring for the SYU

1. The California District will continue its inspections for the SYU and platforms during the shut-in period. The annual inspection and partial production inspection schedule will be maintained throughout this period.
2. All devices that are in service will be tested as usual.
3. Any departures granted will be taken into account when testing.
4. Casing and tubing pressures will be monitored, particularly those few wells with sustained casing pressure.

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5. A spot check will be made of those vessels or systems that have the nitrogen blanket in lieu of complete purging.
6. The normal electrical and corrosion walk-arounds will be performed.
7. The BSEE will conduct onsite inspections prior to approving the restart of operations.

If you have any questions, please contact me at (805) 384-6334 or nabil.masri@bsee.gov.

Sincerely,



Nabil F. Masri
Regional Supervisor
Office of Field Operations

cc: Mr. Mark Decatur
Environmental and Regulatory Supervisor, ExxonMobil Production Company

CDR Tim Grant
Prevention Department, US Coast Guard